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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Application of PACIFIC GAS AND ELECTRIC COMPANY, a California corporation, for a Permit to Construct the Humboldt Bay-Humboldt #1 60kV Reconductoring Project Pursuant to General Order 131-D. (U 39 E)	Application No. 19-02-___

APPLICATION OF PACIFIC GAS AND ELECTRIC COMPANY FOR A PERMIT TO CONSTRUCT THE HUMBOLDT BAY-HUMBOLDT #1 60 KV RECONDUCTORING PROJECT

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PACIFIC GAS AND ELECTRIC COMPANY

Dated: February 7, 2019

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Application of PACIFIC GAS AND ELECTRIC COMPANY, a California corporation, for a Permit to Construct the Humboldt Bay-Humboldt #1 60kV Reconductoring Project Pursuant to General Order 131-D. (U 39 E)	Application No. 19-02-___

APPLICATION OF PACIFIC GAS AND ELECTRIC COMPANY
FOR A PERMIT TO CONSTRUCT THE
HUMBOLDT BAY-HUMBOLDT #1 60 KV
RECONDUCTORING PROJECT

Pursuant to Section IX(B) of General Order ("GO") 131-D and Rules 2.1 through 2.5 and 3.1 of the California Public Utilities Commission's ("Commission" or "CPUC") Rules of Practice and Procedure, PACIFIC GAS AND ELECTRIC COMPANY ("PG&E") respectfully requests a Permit to Construct ("PTC") for the Humboldt Bay-Humboldt #1 60 kV Reconductoring Project ("Project") to continue to provide safe, reliable and affordable electric service to customers in Humboldt County.

I. PROJECT OVERVIEW

PG&E is proposing to reconductor (replace wires) and modify or replace existing poles on approximately 7.8 miles of PG&E's existing Humboldt Bay-Humboldt #1 60kV Power Line ("HB-H #1 line") to maintain electric transmission system reliability, replace aging facilities, and address an existing curtailment issue associated with Humboldt Bay Generating Station ("HBGS"). The Project is a critical maintenance project aimed at helping PG&E provide more than 71,000 households and businesses in the City of Eureka and surrounding Humboldt County area with safe, reliable, and affordable energy.

The existing HB-H #1 single-circuit 60 kV power line is approximately 8.4 miles long (including a 0.6-mile tap extending north) between Humboldt Bay Substation (1000 King Salmon Avenue, Eureka, California 95503) and Humboldt Substation (3221 Mitchell Heights Drive, Eureka,

California 95503). The Project includes replacing the existing overhead conductor with heavier conductor and structures on approximately 7.8 miles of the existing line between Humboldt Bay Substation and Humboldt Substation. Within the first 0.6 mile of the Project, PG&E will co-locate the HB-H #1 line with the adjacent Humboldt Bay-Eureka 60 kV Power Line ("HB-E line"), which will enable PG&E to permanently remove 14 existing poles from wetlands along the alignment.

To minimize environmental impacts associated with necessary upgrades, PG&E will replace wires and structures within the existing alignment and utilize existing access roads, whenever possible. Replacement structures and construction work areas will be located outside of existing sensitive habitats and wetlands to the greatest extent feasible. The Project will reduce the potential for outages and maintenance and an existing curtailment issue in the existing power line system.

II. REGIONAL CONTEXT AND PROJECT COMPONENTS

A. Regional Context

1. Existing Regional Electric System

PG&E's HB-H #1 line is one of three 60kV power lines delivering energy from the HBGS power plant to more than 71,000 customers in Humboldt County and the City of Eureka. The line is critical for transmission system reliability when the other two lines – the Humboldt Bay-Humboldt #2 60 kV Power Line ("HB-H #2 line") and the HB-E line – are out of service either for maintenance or an unexpected outage.

The HB-H #1 line is a single-circuit line from Humboldt Bay Substation to Humboldt Substation. Many of the structures along the HB-H #1 line were built in the 1950s and are ready to be replaced. In addition, the existing lighter conductor on the line has greater potential to deteriorate in the damp, coastal environment than the heavier conductor currently used in maintenance projects. Due to the current size of the conductor, power generation at HBGS must be curtailed when HB-H #1 is the sole line in operation; without curtailment, potential outages would result. The Project includes heavier conductor to ensure the

continued safe operation of the line, to better resist the coastal environment, and to address the curtailment issue at HBGS.

Prominent geographic features that intersect the Project alignment include Highway 101, the City of Eureka, the Elk River, Buhne Slough, Martin Slough, and Ryan Slough. The existing alignment follows along approximately 2.5 miles of residential streets and crosses approximately 5.9 miles of open space areas. Grazing is the predominant land use throughout much of the Project alignment. In the portions of the Project near residential areas, the land use ranges from city streets to light residential, interspersed with forested areas.

B. Project Components

The Project includes replacing conductors and replacing or modifying existing structures along 7.8 miles of the HB-H #1 line. The Project also includes reconductoring and co-locating the first 0.6 miles of the HB-E line with the HB-H #1 line and relocating approximately 600 feet of the HB-H #2 line to allow for the permanent removal of 14 existing structures from wetlands. The Project includes the following major components:[1]

1. Humboldt Bay-Humboldt #1 60kV Power Line (approximately 7.8 miles)

PG&E will replace the existing 60 kV power line's lighter conductor with heavier, oil impregnated aluminum for 7.8 miles of the existing HB-H #1 line. The heavier conductor will ensure the continued safe operation of the line, will better resist the coastal environment, and will address the curtailment issue at HBGS. To support the heavier conductor, the Project includes replacing approximately 120 existing wood and light duty steel poles ("LDS") poles with approximately 67 wood poles, 38 LDS poles, two tubular steel poles ("TSP"), four lattice steel towers ("LST"), and one engineered direct embedded pole. The existing wood and LDS poles on the alignment are

[1] All project details are preliminary and subject to change with final engineering, CPUC requirements, and other factors.

approximately 44 to 73 feet tall. The new wood poles and LDS poles for this project will range from approximately 47 feet to 90 feet tall. TSPs for this project will range from approximately 67 to 77 feet tall and LSTs will range from approximately 85-115 feet tall. The first 0.6 mile of the HB-H #1 line will be installed on a new single-circuit TSP and four double-circuit LSTs co-located with the HB-E line, which will allow for longer span lengths and fewer structures in wetlands. This will reduce ground disturbance and impacts to sensitive biological resources as fewer structures will need to be installed and maintained. One manual transmission switch will be replaced with a SCADA (Supervisory Control and Data Acquisition) switch and moved from an existing wood pole to a direct embedded steel pole. Six existing wood poles will be removed from service, and four wood poles will be shortened to remain as distribution poles.

2. Humboldt Bay-Eureka 60 kV Power Line (approximately 0.6 mile)

The first 0.6 mile of the HB-E line will be reconductored and installed on one double-circuit TSP (co-located with the HB-H #2 line) and four double-circuit LSTs (co-located with the HB-H #1 line). On this line, seven wood poles will be removed from service and three wood poles will be shortened to remain as distribution poles.

3. Humboldt Bay-Humboldt #2 60 kV Power Line (approximately 600 feet)

One single wood pole will be removed and the line moved to the new double circuit TSP with the HB-E line. No reconductoring will occur on this line segment.

4. Temporary Structures

a. Guard Structures

The Project will include reconductoring over Highway 101 and several roads in Humboldt County and the City of Eureka. To prevent conductors from falling to the ground during reconductoring, temporary guard structures will be installed at certain road crossings for safety. Most of these structures will be temporary, direct-buried wood poles that typically extend approximately 50 feet aboveground and approximately seven feet below ground. In some cases, to minimize

impacts, the structure will have a weighted base attached to the temporary pole and be placed on a paved surface (commonly known as "flower pots"). Bucket or line trucks may be used in lieu of poles in some locations, as conditions dictate. Some guard structures will include netting installed at crossings to provide additional protection.

b. Snub Poles

Snub poles are temporary wood poles used to facilitate pulling operations. Approximately four temporary snub poles may be required at each pull site where the conductor cannot be attached directly due to structure design. Snub poles typically extend approximately 70 feet above ground and approximately 10 feet below ground. Snub poles will be removed upon completion of each wire pull.

5. Work Areas and Access Routes

Removing, assembling, and installing structures will require an approximately 0.3-acre work area at the base of each structure. Mowing and vegetation removal will be required to prepare the some of the work areas. While grading is not anticipated at most locations, some limited leveling and filling may occur as needed.

Construction vehicles are anticipated to access work areas primarily by using existing access routes currently used for existing operations and maintenance. Existing access routes may be paved or dirt/gravel. In more remote areas, temporary overland routes will be used for vehicle access. In wetland areas, PG&E may install temporary matting to minimize ground disturbance while accessing work sites. Tree trimming, graveling, matting, and plating may be required to improve certain access roads.

Construction materials will be delivered using helicopters or line trucks and will be staged within work areas near existing structures. The areas will be restored in accordance with the Applicant Proposed Measures identified in the enclosed Proponent's Environmental Assessment ("PEA"), Project permits, and landowner preferences.

6. Helicopter Work

To avoid extensive ground disturbance in wetland areas and reduce the need to add gravel to access routes, PG&E will use helicopters to string the conductor and to replace and modify several structures. Approximately five helicopter landing zones will be required and will have a temporary footprint of approximately one acre. Ground access to landing zones will be by existing or temporary overland access routes. Site preparation is expected to be limited to grass mowing for the majority of the landing zones; however, some limited surface blading, grading, and filling to create a stable and level area may occur as needed. Vegetation removal, tree trimming, and matting or plating may be required for vehicle access to landing zones.

7. Pull Sites

Approximately 14 pull sites will be established at locations throughout the Project to facilitate reconductoring and will be selected to avoid or minimize impacts on sensitive resources. Pull sites will have a footprint of up to one acre, ranging in size from 300 feet x 100 feet to as small as 80 feet x 40 feet. The pull sites will be located generally in line with the conductor within PG&E's existing alignment and used for equipment and material staging areas as well as reconductoring activities.

The location and exact footprint of the sites will depend on conditions on the ground and will not be determined until just prior to construction. Site preparation is expected to be limited to grass mowing for the majority of the pull sites; however, some limited surface blading, grading, and filling may occur on an as-needed basis to create a stable and level work area. Vegetation removal, tree trimming, matting or plating of drainage crossings, and placement of gravel may be required to establish safe and functional pull sites.

III. THE APPLICANT

Since October 10, 1905, PG&E has been an operating public utility corporation, organized under the laws of the State of California. PG&E is engaged principally in the business of furnishing

gas and electric service in California. PG&E's principal place of business is 77 Beale Street, San Francisco, California 94105.

Communications with regard to this Application should be addressed to:

Jillian Blanchard
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Incorporated herein by reference is a certified copy of PG&E's Articles of Incorporation, effective April 12, 2004, which was filed with the Commission in connection with PG&E's Application No. A.04-05-005 on May 3, 2004.

A copy of PG&E's most recent proxy statement dated April 10, 2018, was filed with the Commission on May 15, 2018, with Application 18-05-014 and is incorporated herein by reference. Copies of PG&E's most recent financial statements (contained in the Form 10-Q Quarterly Report filed on November 5, 2018, by PG&E Corporation and the Pacific Gas and Electric Company, for the period ending September 30, 2018), were filed with the Commission on November 20, 2018, with Application No. 18-11-013 and are incorporated herein by reference.

IV. ADDITIONAL INFORMATION REQUIRED BY SECTION IX (B) OF GO 131-D:

Pursuant to Rule 2.4 (b) of the Commission's Rules of Practice and Procedure, PG&E has submitted a PEA, which is attached as Exhibit B to this Application. The following information is required by Section IX(B) of GO 131-D:

a. A description of the proposed power line and substation facilities, including the proposed power line route; proposed power line equipment, such as tower design and appearance, heights, conductor sizes, voltages, capacities, substations, switchyards, etc., and a proposed schedule for authorization, construction, and commencement of operation of the facilities.

A detailed description of the Project, including the alignment, proposed equipment, and project components, is contained in Section II.B above and in Chapter 2 of the PEA, Exhibit B. A Preliminary Project Schedule is attached as Exhibit C to this Application.

b. A map of the proposed power line routing or substation location showing populated areas, parks, recreational areas, scenic areas, and existing electrical transmission or power lines within 300 feet of the proposed route or substation.

An overview map showing the Project route and existing power lines within 300 feet of the Project is attached as Exhibit A. A figure showing additional details of the Project is provided in Chapter 2 of the PEA, Exhibit B (Figure 2.3-1). Maps showing populated areas, parks, and recreational and scenic areas near the Project alignment are provided in Chapter 3 of the PEA, Exhibit B, (Figures 3.1-1, 3.2-1, 3.12-1, and 3.15-1). There are no formally designated State Scenic Highways or county or local scenic roadways that will be affected by the Project.

c. Reasons for adoption of the power line route or substation location selected, including comparison with alternative routes or locations, including the advantages and disadvantages of each.

As discussed in Chapter 2 of the PEA, Exhibit B, this Project consists of reconductoring an existing power line, and accordingly, the discussion of routing issues required in GO 131-D, Section IX(B)(1)(c) is not applicable to this Application.

d. A listing of the governmental agencies with which proposed power line route or substation location reviews have been undertaken, including a written agency response to applicant's written request for a brief position statement by that agency. (Such listing shall include The Native American Heritage Commission, which shall constitute notice on California Indian Reservation Tribal governments.) In the absence of a written agency position statement, the utility may submit a statement of its understanding of the position of such agencies.

U. S. Fish and Wildlife Service ("USFWS")

PG&E provided initial Project description information to the USFWS in February 2018 and explained that the Project is not likely to cause take of federally listed species regulated by the

USFWS. USFWS staff members stated that they may agree with this finding, but requested specific Project details to confirm this conclusion. After completing additional Project design, PG&E provided a response to the USFWS in January 2019 to respond to USFWS' specific questions. USFWS staff has not identified any concerns regarding the Project in its correspondence to date.

National Marine Fisheries Service ("NMFS")

PG&E sent initial Project information to NMFS in February 2019. PG&E explained that the Project will avoid all in-water work, will span over waters at existing power line crossings and, accordingly, the Project is not anticipated to cause any impacts to federally-listed species regulated by NMFS.

Federal Aviation Administration ("FAA")

PG&E submitted "Notices of Construction" for each structure to be replaced or modified to the FAA using the online Form 7460-1 in April 2018. The FAA responded with no hazard determinations for each of the structures.

U.S. Army Corps of Engineers ("USACE")

PG&E presented the Project to USACE staff at meetings during February and July 2018. PG&E explained that a draft permit application is being prepared and likely will be submitted in early 2019. USACE staff did not identify any initial concerns with the Project during either of the two meetings.

California Department of Fish and Wildlife ("CDFW")

PG&E reached out by phone and email to CDFW in May 2018 and explained that the Project is not anticipated to cause the take of any state-listed species, but will require a Streambed Alteration Notification under Section 1600 et. seq. of the California Fish and Game Code. CDFW requested additional Project description details in June 2018. After completing additional Project design, PG&E provided detailed responses to CDFW's questions in December 2018 along with a Project map. CDFW staff has not identified any concerns with the Project in its correspondence to date.

Native American Heritage Commission ("NAHC")

Native American coordination was first initiated for this Project on April 25, 2012. As part of the process of identifying cultural resources in or near the Project area, the NAHC was contacted to request a review of the Sacred Lands File. The NAHC responded on May 3, 2012, stating that Native American cultural resources were not identified within 0.5 mile of the Project, but noted that it is always possible for cultural resources to be unearthed during construction activities. The NAHC also provided a contact list of nine Native American individuals or tribal organizations that may have knowledge of cultural resources in or near the Project area. Letters were prepared and mailed to each of the NAHC-listed contacts on May 16, 2012, requesting any information they might regarding any Native American cultural resources in or immediately adjacent to the Project area.

Two responses were received regarding the 2012 coordination letters. The record of these responses is included in Section 3.5 and Appendix D of the PEA, Exhibit B.

PG&E made follow-up phone calls and e-mails to the remaining seven Native American contacts on June 4, 2012, and June 19, 2012. No additional responses were received at that time.

In late 2017, PG&E made a second review of the Sacred Lands File from the NAHC. As a result of that search, the NAHC provided a list of contacts, who all were contacted regarding the Project. The results of those coordination efforts are presented in Section 3.5 and Appendix D of the PEA, Exhibit B. Additionally, the NAHC provided information regarding a new Native American cultural site in the Project area and stated that the Wiyot should be contacted for information specific to that site. In addition to contacting the Wiyot, the six Native American contacts identified by NAHC were contacted either by email or U.S. mail as well as by telephone. PG&E coordinated extensively with a representative of the Wiyot Tribe to address the new Native American cultural site identified in the 2017 NAHC records search, and completed Phase I testing at a location initially recorded as an archeological site location (AS-1) with a Wiyot Tribe representative present.

Ultimately, PG&E was informed that the Wiyot tribe did not have any concerns regarding the Project. None of the other individuals contacted indicated concerns about the Project.

North Coast Regional Water Quality Control Board ("North Coast RWQCB")

PG&E provided an overview of the Project to North Coast RWQCB staff during a phone call on May 9, 2018. The North Coast RWQCB representative provided basic permitting information and did not raise any concerns regarding the Project. PG&E explained that a draft permit application is currently being prepared and likely would be submitted in mid-2019.

California Coastal Commission ("CCC")

PG&E met with the San Francisco Office of the CCC on February 15, 2018, to discuss the Project and to determine whether a waiver under Section 13252(e) of the California Coastal Act regulations would be appropriate for a maintenance project of this kind. The CCC indicated that a waiver may be possible but that they would need additional Project details to make the determination.

After completing additional Project design, PG&E met with the CCC on November 14, 2018, to review detailed Project information and to determine next steps for permit compliance.

During conference calls on December 19, 2018, and January 17, 2019, PG&E discussed the permitting approach for the Project. The CCC suggested that, while a waiver for the Project may be possible, it is unlikely to be approved and recommended that PG&E obtain a Coastal Development Permit ("CDP"). The CCC representative also suggested that the wetlands impacted by the Project may not be considered an environmentally sensitive habitat area ("ESHA"), which, if true, would expedite the permitting process. The CCC asked PG&E to submit detailed information regarding biological resources in the Project area to help the CCC make the ESHA determination. If the Project is located within an ESHA, CCC staff discussed the possibility of using a "utility repair and maintenance" CDP to permit the Project. The CCC will be a responsible agency under CEQA. PG&E anticipates ongoing coordination with CCC during the first quarter of 2019 to determine the most appropriate permitting approach for Coastal Act compliance.

The Project falls within both the retained jurisdiction of the CCC and within the Humboldt Bay Local Coastal Plan. Humboldt County has requested to have the CCC review the entire Project review under the Coastal Act, including the areas within Humboldt County's Local Coastal Plan. CCC staff has confirmed that the CCC will accept Humboldt County's consolidation request and review the entire Project.

Humboldt County

PG&E presented the Project to Humboldt County Public Works staff on July 10, 2018, to discuss the proposed construction within roads and sidewalks within Humboldt County. Public Works staff raised potential concerns regarding the need for compliance with the Americans with Disabilities Act ("ADA") when replacing poles in sidewalks. PG&E provided a memo on September 27, 2018, to Humboldt County proposing ADA compliant designs for pole replacements in sidewalks.

On November 16, 2018, Public Works staff requested additional information, and specifically requested 48" of space at each sidewalk location to comply with the ADA. PG&E will continue to work with Humboldt County's Public Works staff to develop a solution that addresses Humboldt County's ADA concerns and minimizes impacts to adjacent residences.

PG&E contacted Humboldt County Planning Department staff by email on February 13, 2018, to discuss Coastal Act compliance and to present an overview of the Project. Planning staff confirmed its preference to have the CCC review the entire Project under the Coastal Act. Humboldt County sent a consolidation request to the CCC on May 10, 2018. On July 31, 2018, PG&E followed up with planning staff to confirm whether planning staff had any potential concerns regarding the Project. Planning staff did not identify any Project related concerns.

City of Eureka

PG&E provided an overview of the Project to City of Eureka staff on April 12, 2018, in Eureka and discussed strategies to minimize any potential impacts on City utilities and residents. The

City requested that PG&E complete construction near Grant Elementary School during summer break, which is consistent with PG&E's construction plan. The City also mentioned the importance of traffic control on Campton Road, and locating a City sewer line that runs near PG&E's pole line. PG&E confirmed with the City that the Project will include measures to avoid traffic impacts on Campton Road and that the Project engineers have obtained utility information near PG&E's alignment for use during Project design. PG&E provided a draft of this summary to the City on January 16, 2019.

V. MEASURES TAKEN TO REDUCE EMF EXPOSURE

Section X(A) of GO 131-D requires that applications for a PTC include a description of the measures taken or proposed by the utility to reduce the potential exposure to electric and magnetic fields ("EMF") generated by the proposed facilities. In accordance with Section X(A) of GO 131-D, CPUC Decision No. D.06-01-042 ("EMF Decision"), and PG&E's EMF Design Guidelines prepared in accordance with the EMF Decision, PG&E has reviewed the Project to determine available no-cost and low-cost magnetic field reduction measures to be incorporated in the design of the proposed Project. The following measure will be incorporated to reduce the magnetic field strength levels from electric power facilities:

- Raising the height of fifty-three structures in the school/daycare and residential land use areas by 10 feet taller than otherwise required to reduce magnetic field strength at ground level.

The Commission's EMF Decision and PG&E's EMF Design Guidelines require PG&E to prepare a Field Management Plan ("FMP") that indicates the no-cost and low-cost EMF measures that will be installed as part of the final engineering design for the Project. The FMP evaluates the no-cost and low-cost measures considered for the Project, the measures adopted, and reasons that certain measures were not adopted. A copy of the Preliminary Field Management Plan for this Project is attached as Exhibit D.

VI. PUBLIC NOTICE

Pursuant to Section XI(A) of GO 131-D, notice of the Application will be sent to Humboldt County, the City of Eureka, Humboldt Community Services District, the California Energy Commission, the State Department of Transportation, its Division of Aeronautics, and its District 1 Office, the Secretary of the California Resources Agency, CDFW and its Region 1 Office, CCC and its Division of Energy, Ocean Resources and Federal Consistency, the California Water Resources Control Board, the California Air Resources Board, the North Coast Unified Air Quality Management District, the North Coast RWQCB, the NAHC, the USFWS, NMFS, USACE, all owners of land within 300 feet of the proposed Project (as determined by the most recent local assessor's parcel roll available to PG&E at the time the notice is sent), and any other interested parties that have requested such notification.

In accordance with Section XI(A)(2), within 10 days after filing the Application, PG&E will publish a notice of the Application once a week for two successive weeks in the Eureka Times-Standard. In accordance with Section XI(A)(3), PG&E will also post a notice of the Application on-site and off-site where the Project is located. PG&E will deliver a copy of the notice to the CPUC Public Advisor and the CPUC's Energy Division in accordance with Section XI(A)(3), and will file a declaration of mailing and posting with the Commission within five days after completion.

VII. EXHIBITS

The following exhibits are attached and incorporated by reference to this Application:

Exhibit A: Project Overview Map

Exhibit B: Proponent's Environmental Assessment

Exhibit C: Preliminary Project Schedule

Exhibit D: Preliminary EMF Field Management Plan

VIII. CONCLUSION

PG&E respectfully requests that the Commission:

1. Issue a Decision and Order, effective immediately, granting PG&E a Permit to Construct the Humboldt Bay-Humboldt 60 kV Reconductoring Project, adopting an appropriate environmental document for the Project, and granting any other permission and authority necessary to construct, operate, and maintain the Project.

2. Authorize Energy Division to approve requests by PG&E for minor project modifications that may be necessary during final engineering and construction of the Project so long as Energy Division finds that such minor project modifications would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

3. Grant such other and further relief as the CPUC finds just and reasonable.

Respectfully submitted,

DAVID T. KRASKA
JO LYNN LAMBERT
JILLIAN BLANCHARD

By: *_/s/ Jillian Blanchard_*

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Attorneys for Applicant
PACIFIC GAS AND ELECTRIC COMPANY

Dated: February 7, 2019

SCOPING MEMO INFORMATION

Category:

Ratesetting. Pursuant to Rule 2.1(c) of the Commission's Rules of Practice and Procedure, the application must propose a category for the proceeding as defined in Rule 1.3. If none of the enumerated categories are applicable, proceedings will be categorized under the catch-all "ratesetting" category. (CPUC Rule 7.1 (e)(2).) The Commission has consistently found that applications for CPCNs and PTCs under GO 131-D do not fit within any of the enumerated categories and should therefore be considered as "ratesetting proceedings."

Need for hearing:

The CPUC has determined that issues related to Project need and cost are not within the scope of PTC applications, leaving only environmental review as a relevant issue. No areas of environmental or other public concern are known. If concerns about the Project are raised, PG&E recommends that a public participation hearing be held.

Issues:

None known.

Safety considerations:

The Project is being constructed, in part, to replace aging structures, which will increase the safety of the existing line. PG&E workers will utilize construction BMPs, standard health and safety procedures, and guard structures to ensure the safety of workers and nearby residents throughout construction. PG&E will also coordinate with any applicable emergency service providers in the event of any road or lane closures associated with construction. PG&E will submit a Helicopter Use Plan and will comply with all FAA and other legal requirements relating to helicopter safety. PG&E will prepare a Worker Environmental Awareness Program and will implement hazardous substance control/emergency response and fire risk procedures, and will comply with all measures and applicable laws, to address potential hazardous materials, wildfire and other safety issues. Removed towers will be tested for lead paint and asbestos, and will be disposed of appropriately in accordance with applicable law.

Proposed Schedule:

See Part VII of the Application and Exhibit C, attached.

VERIFICATION

I, the undersigned, declare:

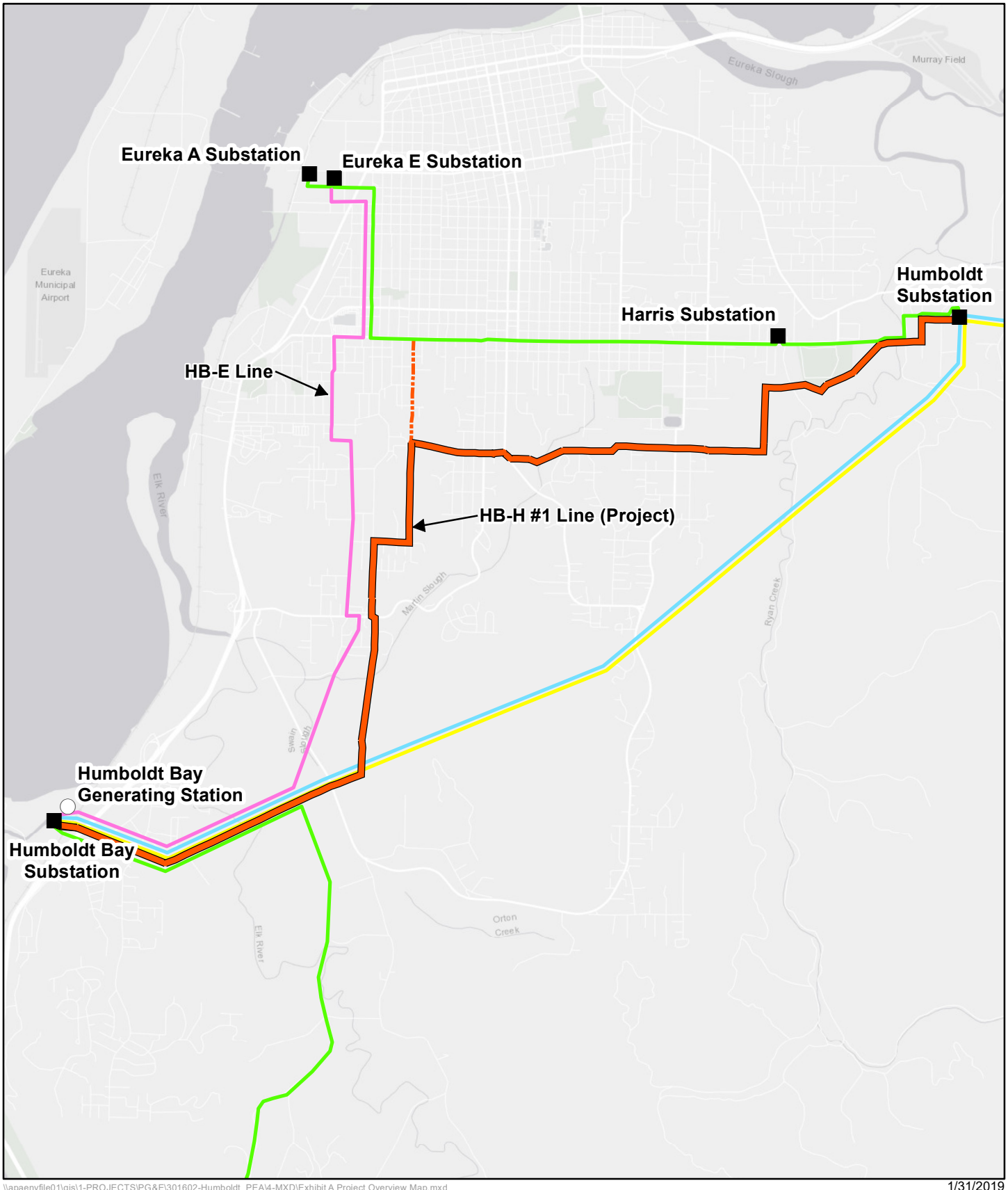
I am an officer of PACIFIC GAS AND ELECTRIC COMPANY, a corporation, and am authorized to make this verification on its behalf. The statements in the foregoing document relating to PG&E facilities are true of my own knowledge, except as to matters which are stated on information or belief, and as to those matters I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 1/17/19 at San Francisco, California.

Andrew K. Williams
Vice President, Land & Environmental Management

EXHIBIT A
PROJECT OVERVIEW MAP



- Substations
- Generation
- Humboldt Bay-Humboldt (HB-H) #1 60 kV Power Line - Proposed Project
- Humboldt Bay-Humboldt #1 60 kV Tap (approximate)
- Humboldt Bay-Humboldt #2 60 kV Power Line
- Humboldt Bay-Eureka (HB-E) 60 kV Power Line
- Other 60 kV Power Lines
- 115 kV Power Line

Exhibit A
Project Overview Map
Humboldt Bay-Humboldt #1 60 kV Reconductoring Project

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Results you can rely on

EXHIBIT B
PROPONENT'S ENVIRONMENTAL ASSESSMENT

CPUC Rules of Practice and Procedure Rule 1.13(b)(1)(ii) prevents electronic filing of documents of over 1.5 gigabytes in size. Due to the large size of this exhibit, it has been excluded from the electronic version of the application and submitted for filing to the Docket Office on an Archival-Grade DVD with additional CD-ROM copies.

EXHIBIT C
PRELIMINARY PROJECT SCHEDULE

Exhibit C

PRELIMINARY PROJECT SCHEDULE

PTC Application submitted	February 7, 2019
Protests and notice of deficiencies, if any	March 2019 – June 2019
Response to any deficiencies and data requests	May 2019 – July 2019
Application complete	June 2019 or sooner
Draft Mitigated Negative Declaration (MND) released	August 2019
Close of Public Review Period	September 2019
Mitigated Negative Declaration (MND) adopted (no later than 180 days (6 months) from complete application per CEQA Guidelines § 15107)	October 2019
PTC Decision Approved and Effective	Winter 2019-20
Acquisition of secondary permits	June 2019 - May 2020
Acquisition of land rights as needed	Summer 2019- Spring 2022
Materials Procurement	June 2019- October 2021
Initial Notice to Proceed / Construction Begins	Spring 2022
Construction Complete	May – December 2022
Project Operational	Winter 2022

EXHIBIT D
PRELIMINARY EMF FIELD MANAGEMENT PLAN

PRELIMINARY TRANSMISSION MAGNETIC FIELD MANAGEMENT PLAN
HUMBOLDT BAY-HUMBOLDT #1 60 KV LINE RECONDUCTORING PROJECT

I. General Description of Project

Project Lead: Project Manager, Electric Transmission Maintenance and Construction

Transmission Lines: Humboldt Bay-Humboldt #1 60 kV Line

Distribution line Underbuild: 12 kV.

Scope of Work:

Current scope of work is to reconductor Humboldt Bay-Humboldt #1 60 kV (Approximately 7.8 miles long) with 715 AAC "Violet" conductor. Within the same project alignment, the scope includes reconductoring the first 0.6 miles of the Humboldt Bay-Eureka line and co-locating it on lattice steel towers with the Humboldt Bay-Humboldt #1 60 kV line. The rest of the line is on a Single Circuit Pole Line (SCPL) and the scope starts at Humboldt Bay Substation and ends at Humboldt #1 Substation. The tap (004/002-000/009) is NOT part of scope of work, which connects Humboldt #1 and Eureka.

The estimated total cost of the proposed project is approximately $13,200,000. Four percent of this estimated total cost is $528,000.

II. Background: CPUC Decision 93-11-013 and Decision D.06-01-042

On January 15, 1991, the CPUC initiated an investigation to consider its role in mitigating the health effects, if any, of electric and magnetic fields (EMF) from utility facilities and power lines. A working group of interested parties, called the California EMF Consensus Group, was created by the CPUC to advise it on this issue. It consisted of 17 stakeholders representing citizens groups, consumer groups, environmental groups, state agencies, unions, and utilities. The Consensus Group's fact-finding process was open to the public, and its report incorporated concerns expressed by the public. The Consensus Group's recommendations were filed with the Commission in March 1992.

In August 2004 the CPUC began a proceeding known as a "rulemaking" (R.04-08-020) to explore whether changes should be made to existing CPUC policies and rules concerning EMF from electric transmission lines and other utility facilities.

Through a series of hearings and conferences, the Commission evaluated the results of its existing EMF mitigation policies and addressed possible improvements in implementation of these policies. The CPUC also explored whether new policies were warranted in light of recent scientific findings on the possible health effects of EMF exposure.

The CPUC completed the EMF rulemaking in January 2006 and presented these conclusions in Decision D.06-01-042:

- The CPUC affirmed its existing policy of requiring no-cost and low-cost mitigation measures to reduce EMF levels from new utility transmission lines and substation projects.

- The CPUC adopted rules and policies to improve utility design guidelines for reducing EMF, and established a utility workshop to implement these policies and standardize design guidelines.

- Despite numerous studies, including one ordered by the Commission and conducted by the California Department of Health Services, the CPUC stated "we are unable to determine whether there is a significant scientifically verifiable relationship between EMF exposure and negative health consequences."

- The CPUC said it will "remain vigilant" regarding new scientific studies on EMF, and if these studies indicate negative EMF health impacts, the Commission will reconsider its EMF policies and open a new rulemaking if necessary.

In response to a situation of scientific uncertainty and public concern, the decision specifically requires utilities to consider "no-cost" and "low-cost" measures, where feasible, to reduce exposure from new or upgraded utility facilities. It directs that no-cost mitigation measures be undertaken, and that low-cost options, when they meet certain guidelines for field reduction and cost, be adopted through the project certification process. PG&E was directed to develop, submit and follow EMF guidelines to implement the CPUC decision. According to the guidelines, four percent of total project budgeted cost is the benchmark used to determine "low-cost" in

implementing EMF mitigation, and mitigation measures should achieve incremental magnetic field reductions of at least 15% at the edge of right-of-way (ROW).

III. No-Cost and Low-Cost Magnetic Field Mitigation

No Cost Field Reduction

Optimal phase configurations can be used as a field cancellation technique. The phases from one circuit of a multi-circuit line can be used to reduce the field from another circuit, thereby reducing the total magnetic field strength. For this reason, multi-circuit lines may have lower magnetic fields than single circuit lines. The Humboldt Bay-Humboldt #1 60 kV line is a single circuit and optimal phasing is not available.

IV. General Description of Surrounding Land Uses

Schools or Daycare: Two structures.

Residential: Fifty-one structures.

Commercial/Industrial: Seven structures.

Recreational: Two structures.

Agricultural, Rural, and Undeveloped Land: Sixty-two structures.

Priority Areas where Low Cost Measures Should Be Considered

Fifty-three structures in the school/daycare and residential land use areas are considered for magnetic field reduction.

Low Cost Magnetic Field Reduction Options

Reducing magnetic field strength by increasing the distance from the source can be accomplished either by increasing the height or depth of the conductor from ground level. Furthermore, locating the power lines as far away from the edge of the ROW or as close to centerline as possible will result in lower field levels at the edge of the ROW. Below are calculations showing magnetic field reductions from raising conductor heights an additional 10 feet more than needed to meet clearance requirements:

Segment	Base Case		Raise 10 Feet		Reduction	
	North ROW	South ROW	North ROW	South ROW	North ROW	South ROW
HUMBOLDT BAY-HUMBOLDT #1 60 KV LINE	31.6 mG	31.6 mG	20.9 mG	20.9 mG	33.9%	33.9%

The purpose of magnetic field modeling is to evaluate relative effectiveness of various magnetic field reduction measures, not to predict magnetic field levels

No Cost and Low Cost Magnetic Field Mitigation Measures

The following table identifies the no cost and low cost field mitigation measures for each line segment, including the reasoning for each, and the estimated cost to adopt the measure.

HUMBOLDT BAY-HUMBOLDT #1 60 KV LINE SEGMENT						
Project Segment (Pole/Tower ID #)	Location (Street, Area)	Adjacent Land Use	Reduction Measure Considered	Measure Adopted?	Reason(s) if not adopted	Estimated Cost to Adopt
TSP #1 - 2/1		Undeveloped, Agricultural, Rural				
2/2 & 2/3		Residential	Raise Conductor 10 Feet	Yes		$2,400
2/4 - 2/7		Undeveloped, Agricultural, Rural				
2/8 - 2/12		Residential	Raise Conductor 10 Feet	Yes		$6,000
2/12 Stub - 2/13		Commercial/Industrial				
3/0		Residential	Raise Conductor 10 Feet	Yes		$1,200
3/1 - 3/3		Undeveloped, Agricultural, Rural				
3/4 - 3/11		Residential	Raise Conductor 10 Feet	Yes		$14,400
3/12 - 4/0		Undeveloped, Agricultural, Rural				
4/1 & 4/2		Residential	Raise Conductor 10 Feet	Yes		$2,400
4/3 - 4/5		Undeveloped, Agricultural, Rural				
4/6 & 4/9		Residential	Raise Conductor 10 Feet	Yes		$4,800
4/10 & 4/11		School/Daycare	Raise Conductor 10 Feet	Yes		$2,400
4/12 & 4/13		Residential	Raise Conductor 10 Feet	Yes		$2,400
4/14 - 5/0		Undeveloped, Agricultural, Rural				
5/1 - 5/4		Residential	Raise Conductor 10 Feet	Yes		$4,800
5/5		Undeveloped, Agricultural, Rural				
5/6 - 5/13 Stub		Residential	Raise Conductor 10 Feet	Yes		$10,800
5/14 - 6/11		Undeveloped, Agricultural, Rural				
6/12 - 7/0		Commercial/Industrial				
7/1 & 7/2		Recreational				
7/3 - 7/8		Undeveloped, Agricultural, Rural				
7/9 - 7/15		Residential	Raise Conductor 10 Feet	Yes		$12,000

This FMP proposes to raise the height of fifty-three structures in the school/daycare and residential land use areas by 10 feet taller than required for meeting clearance requirements. The estimated cost of this mitigation is $63,600.

V. Conclusion - Field Reduction Options Selected

This FMP proposes to raise the height of fifty-three structures in the school/daycare and residential land use areas by 10 feet taller than required for meeting clearance requirements. The estimated cost of this mitigation is $63,600.

VI. References

California Public Utilities Commission. 1993. Order instituting investigation on the Commission's own motion to develop policies and procedures for addressing the potential health effects of electric and magnetic fields of utility facilities. Decision 93-11-013. November 2.

California Public Utilities Commission. 2006. Order Instituting Rulemaking to update the Commission's policies and procedures related to electromagnetic fields emanating from regulated utility facilities. Decision 06-01-042 January 26.

Pacific Gas & Electric Company. 2006. EMF Design Guidelines for Electrical Facilities.